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10 *Attorneys for Defendants JE Dunn Construction
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Fire Insurance Company, Travelers Casualty
and Surety Company of America and Pacific Indemnity Company*

11
12 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

13
14 UNITED STATES OF AMERICA, for the use
15 and benefit of SUSTAINABLE MODULAR
MANAGEMENT, INC., a Texas corporation,

16 Plaintiff,
17 vs.
18
19 **JOINT MOTION TO EXTEND TIME
TO FILE JOINT PROPOSED
PRETRIAL ORDER**
20 (First Request)
21
22 Defendants.

23
24 And All Related Matters

25
26 Pursuant to LR IA 6-1, Plaintiff, United States of America, for the Use and Benefit of
27 Sustainable Modular Management, Inc. ("SMM"), Defendant/Counterclaimant JE Dunn
28 Construction Company ("JE Dunn"), and Defendants Federal Insurance Company; Hartford Fire

1 Insurance Company; Travelers Casualty And Surety Company Of America (collectively “the
2 Surety Defendants”) jointly move the Court to extend the time for the Parties to file a jointly
3 proposed pretrial order from April 22, 2024, to August 23, 2024 (59 days after the June 25, 2024
4 settlement conference), and in support thereof, respectfully state as follows:

5 1. In its March 21, 2024 Order Granting Motion for Partial Summary Judgment (ECF
6 127), the Court ordered the parties to file a jointly proposed pretrial order pursuant to LR 16-3(b)
7 within thirty days from the date of that order (which would be April 22, 2024 accounting for April
8 20 falling on a Saturday).

9 2. The following day, on March 22, 2024, the Court set a settlement conference for
10 June 25, 2024.

11 3. The preparation of a jointly proposed pre-trial order in this complex matter will
12 consume substantial client resources and attorney time, but the jointly proposed pre-trial order will
13 be unnecessary if the settlement conference results in a settlement of this matter.

14 4. A close family member of counsel for JE Dunn and the Surety Defendants is dealing
15 with a serious health issue which is requiring the time and attention of JE Dunn’s counsel. Even if
16 the Court had not set a settlement conference in June, counsel for JE Dunn would require an
17 extension of the April 22, 2024 proposed pretrial order filing deadline for this reason.

18 5. The Parties jointly request an extension of the time within which to file their jointly
19 proposed pre-trial order until August 23, 2024, 59 days after the June 25, 2024 settlement
20 conference. The parties request more than 30 days because of the complexity of the case, the time
21 both counsel anticipate will be required to prepare the jointly proposed pretrial order, and to
22 accommodate summer vacation plans in July.

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1 6. This Motion is made in good faith and not to delay the trial preparation process.
2 This is the Parties' first request for an extension of this deadline.

3 DATED this 29th day of March 2024.

4 **VerisLaw, PLLC**

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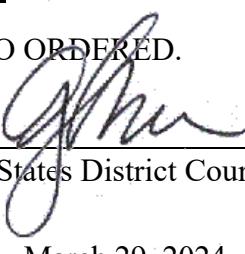
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25 *Attorneys for Defendant/Counterclaimant
26 JE Dunn Construction Company and Surety
27 Defendants*

28 **ORDER**

1 IT IS SO ORDERED.

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3 _____
4 United States District Court Judge

5 DATED March 29, 2024